

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
(Jackson Division)

THE UNITED STATES OF AMERICA )  
and THE STATE OF MISSISSIPPI, )  
                                  )  
Plaintiffs,                   )  
                                  )  
v.                             )       Case No. 3:12-cv-790 TSL-JMR  
                                  )  
THE CITY OF JACKSON, MISSISSIPPI, )  
                                  )  
Defendant.                   )  
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\_\_\_\_\_

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**JOINT MOTION TO ENTER CONSENT DECREE**

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COME NOW, the United States of America and the State of Mississippi, and hereby respectfully request that the court approve the proposed Consent Decree lodged in this matter on November 11, 2012 (Docket #2). The grounds for this Motion are set forth in the accompanying Memorandum in Support of Joint Motion to Enter Consent Decree being filed simultaneously herewith, and a copy of the previously lodged Consent Decree is being provided electronically to the Judge's chamber as well.

Dated: March 1, 2013

Respectfully submitted,

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Environment and Natural Resources Division

/S/Karl J. Fingerhood

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ATTORNEYS FOR PLAINTIFF  
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Dated: March 1, 2013

/S/ Christopher G. Wells with permission by KJF

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ATTORNEY FOR PLAINTIFF STATE OF MISSISSIPPI BY AND THROUGH THE  
MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY AND THE MISSISSIPPI  
DEPARTMENT OF ENVIRONMENTAL QUALITY